

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA §
§
v. § CRIMINAL NO. 4:18-CR-575
§ (HUGHES)
JACK STEPHEN PURSLEY, §
AKA STEVE PURSLEY, §
Defendant. §

**DECLARATION OF SUSAN ENGLISH ABOUT SEARCH FOR IRS
CORRESPONDENCE WITH THE DEFENDANT**

SUSAN ENGLISH, pursuant to 28 U.S.C. § 1746, hereby declares under penalty of perjury, to the best of her information and belief:

1. I am a Court Witness Coordinator for the Internal Revenue Service Criminal Investigation Division. I submit this Declaration to provide details of the searches that I did for correspondence between the IRS and defendant Jack Stephen Pursley.

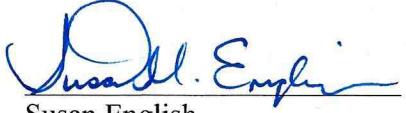
2. I reviewed the IRS's Integrated Data Retrieval System (IDRS) for the years 1995 through the present. I determined that, according to IDRS, there were no notices or letters issued prior to 2010 to Jack Stephen Pursley. With respect to the notices listed as having been sent to defendant Pursley in the years 2010 through the present, I searched for corresponding document locator numbers in IDRS, but found none. The lack of document locator numbers for these documents indicates that copies of the specific notices issued to the defendant were not saved in the IRS system. I also searched a system called "Control-D" for all notices/letters issued to the defendant from 2010 to the present; no documents were found.

3. I provided to the prosecutor copies of six current templates of the notices sent to the defendant in the years 2010 through the present.

4. I reviewed all documents for defendant Pursley for the years 1995 through the present that are scanned into the IRS's Computer Imaging System, which are accessible to me through the Account Management Services system. I found one letter sent from the IRS to defendant Pursley in 2012, which I certified for use at trial and provided to the prosecutors.

5. I consulted with seven different employees of the IRS with respect to the possible searches: two court witness coordinators, an IT specialist, a supervisory revenue agent and a revenue agent with the IRS's Small Business/Self Employed examination division, a fraud detection analyst, and a computer assistant with the Wage and Investment Division's Account Management unit.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 26, 2018.

By: 
Susan English
IRS Court Witness Coordinator